

# **EXHIBIT 2**



Deposition of:  
**Kara Corrado**

*September 10, 2019*

In the Matter of:  
**Russell, Monique Vs. Educational  
Commission For Foreign Medical  
Graduates**

Veritext Legal Solutions

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1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE EASTERN DISTRICT OF PENNSYLVANIA

3                                 - - -  
4           MONIQUE RUSSELL, JASMINE : Case No.  
5           RIGGINS, ELSA M. POWELL :  
6           AND DESIRE EVANS,        : 2:18-cv-05629-JW  
7                                     :  
8                                     :  
9                                     :  
10                  Plaintiffs,      :  
11                                     :  
12                  vs.                : Hon. Joshua D. Wolson  
13                                     :  
14                  :  
15                  EDUCATIONAL COMMISSION   :  
16                  FOR FOREIGN MEDICAL     :  
17                  GRADUATES,             :  
18   :  
19                  Defendant.           :  
20   - - -  
21   :  
22   :  
23   :  
24   :

September 10, 2019

Oral deposition of KARA CORRADO, taken  
at the offices of MORGAN LEWIS BOCKUS, LLP,  
1701 Market Street, Philadelphia, Pennsylvania  
beginning at 10:48 a.m., before  
Jennifer L. McDonald, a Professional Reporter  
and a Notary Public in and for the Commonwealth  
of Pennsylvania.

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1 special investigations and the addition  
2 of case managers, it fell under the  
3 purview of the associate vice president,  
4 who was Bill Kelly, and I, at the time, a  
5 manager of operations program  
6 development.

7 So Bill, myself, and Virginia  
8 Kesting, who reported to me, we were the  
9 folks working on the irregular behavior.  
10 So in that respect when I was working for  
11 Bill, I was staff.

12 | BY MR. THRONSON:

13 Q. When did you get involved in  
14 work on irregular behavior matters?

15 A. That was around 2008 when I  
16 moved -- changed position.

17 Q. So the staff for the irregular  
18 behavior is part of the special investigations  
19 team?

20 A. That is the special  
21 investigations team now, yes.

22 Q. Okay. Got it. How does ECFMG  
23 serve the public?

24 MS. MCENROE: Objection to form.

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1                   THE WITNESS: ECFMG serves the  
2 public in a number of ways. Our original  
3 program which was the certification  
4 program serves the public in ensuring  
5 that those physicians that are educated  
6 outside of the U.S. and Canada meet  
7 certain minimum requirements in order to  
8 enter an accredited residency program in  
9 the United States.

10                  We also serve the public in  
11 facilitating an appropriate review of  
12 them, at the same time making sure that  
13 we are efficient about doing it, because  
14 IMGs -- or International Medical  
15 Graduates represent about 25 percent of  
16 the physicians that are working in the  
17 United States.

18                  So it's important from a  
19 physician-workforce point of view to make  
20 sure we have qualified physicians. So in  
21 those two broad ways I would say that we  
22 serve the public.

23 BY MR. THRONSON:

24 Q.               How does ECFMG serve medical

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1 residency programs?

2 MS. MCENROE: Objection to form.

3 THE WITNESS: So ECFMG has a  
4 certification program that is required  
5 for entrance into ACGME accredited  
6 residency programs.

7 BY MR. THRONSON:

8 Q. Any other ways in which ECFMG  
9 severs medical residency programs?

10 MS. MCENROE: Objection to form.

11 THE WITNESS: So we also have an  
12 exchange visitor sponsorship program. We  
13 are responsible for physicians who are  
14 seeking residency and training in the  
15 United States on a J-1 nonimmigrancy  
16 step.

17 BY MR. THRONSON:

18 Q. Beyond the ways in which you  
19 serve medical residency programs that you  
20 described, how else does ECFMG serve hospitals?

21 MS. MCENROE: Objection to form.

22 THE WITNESS: I don't know that  
23 I would say that we serve hospitals,  
24 however, we do provide a service for

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1           Q.         So you believe that was also the  
2 process in the late 90s, early 2000s?

3           A.         Yes.

4           Q.         Okay. Do you know of any --  
5 strike that. Do you know of any circumstances  
6 where you would -- where ECFMG would vary from  
7 that process?

8                          MS. MCENORE: Objection to form.

9 BY MR. THRONSON:

10          Q.         That is, would vary from the  
11 process of once a charge letter is sent to an  
12 applicant to refer the matter to the  
13 credentials committee for investigation?

14          A.         Prior to -- like I said, I think  
15 it was around '99, 2000 that the matter would  
16 be referred.

17                          Let me just clarify. Unless  
18 there was some exculpatory evidence that we  
19 discovered after we sent the charge letter,  
20 then we would withdraw the charge letter and it  
21 wouldn't be referred to the credentials  
22 committee; but prior to that there are cases  
23 where we contacted the applicant to ask them to  
24 provide information about an allegation or an

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1 anomaly. In some of those cases they were not  
2 referred to the committee, if that applicant  
3 did not respond.

4 Q. If the applicant did not respond  
5 they were not referred to the committee?

6 A. In some cases. Right, you asked  
7 me if we always referred them.

8 Q. Sure.

9 A. And the answer is no, because  
10 there are some cases that are old, prior to my  
11 time, that we contacted the individual about  
12 the allegation but they are not necessarily  
13 referred to the credentials committee.

14 Q. Do you know why they were not  
15 referred to the credentials committee in those  
16 cases?

17 A. I don't.

18 Q. But as a general rule after a  
19 charge letter was sent, the matter was referred  
20 to the credentials committee as a matter of  
21 course?

22 MS. MCENROE: Objection to form.

23 THE WITNESS: Yes.

24 BY MR. THRONSON:

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1 Q. Obviously this case has a long  
2 history and we covered a lot of this in the  
3 deposition of William Kelly. Did you happen to  
4 read that deposition?

5 A. I did not.

6 Q. Was it made available to you for  
7 review?

8 A. No.

9 Q. Do you know that it had taken  
10 place?

11 A. No.

12 Q. Did ask you for a transcript?

13 A. No, I did not.

14 Q. Why not?

15 MS. MCENROE: Objection to form.

16 THE WITNESS: I don't know. I  
17 didn't ask for one.

18 BY MR. THRONSON:

19 Q. You didn't feel it was important  
20 for your testimony today?

21 MS. MCENROE: Objection to form.

22 THE WITNESS: I don't think I  
23 thought about it to be perfectly honest.

24 BY MR. THRONSON:

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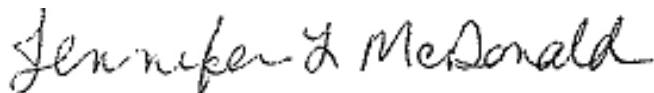
1 C E R T I F I C A T E  
2

3 COMMONWEALTH OF PENNSYLVANIA:

4 COUNTY OF PHILADELPHIA:

5 I, Jennifer L. McDonald, a Notary  
6 Public within and for the County and State  
7 aforesaid, do hereby certify that the foregoing  
8 deposition of KARA CORRADO was taken before me,  
9 pursuant to notice, at the time and place  
10 indicated; that said deponent was by me duly  
11 sworn to tell the truth, the whole truth, and  
12 nothing but the truth; that the testimony of  
13 said deponent was correctly recorded in machine  
shorthand by me and thereafter transcribed  
under my supervision with computer-aided  
transcription; that the deposition is a true  
record of the testimony given by the witness;  
and that I am neither of counsel nor kin to any  
party in said action, nor interested in the  
outcome thereof.

14 WITNESS my hand and official seal this  
15 16th day of Sept  
16

17   
18

19 \_\_\_\_\_  
20 Jennifer L. McDonald,  
21 Notary Public  
22  
23  
24